

REMARKS

Entry of this amendment prior to examination of this application is respectfully requested.

This Amendment is in supplement to the Submission of Request for Reconsideration filed with the RCE on May 26, 2009, and serves as a further response to the Final Office Action mailed July 24, 2008.

By the present amendment, the claims have been amended to incorporate language into various ones of the independent claims corresponding to the suggested language in the Office Action. Although, as noted in the Request for Reconsideration filed on May 26, 2009, applicants submit that the original claim language was quite understandable to those of ordinary skill in the art, in order to expedite the allowance of the present application, the present amendments to each of the independent claims incorporate language along the lines suggested in the Office Action. Therefore, it is respectfully requested that the claim objections set forth on pages 2-5 of the Final Office Action be removed.

Reconsideration and removal of the prior art rejections of the claims based on the primary reference to Machida (USP 4,848,536), whether considered alone or in combination with Motoaki (JP 6-221363) and Hiramatsu (USPub. 2003/0044653) is also respectfully requested. As noted above, by the present amendment, each of the independent claims has been amended to adopt suggestions made on pages 2-5 of the Final Office Action concerning the claim structure. In addition, each of the independent claims has also retained and been amended to further clarify the relationship between the positioning of the rod-like electrodes and the sides of a rectangular substrate when such a rectangular substrate is mounted on the substrate mounting surface. As such, by combining the Examiner's proposed structural

language with the amended claim language concerning the relationship between the sides of the rod-like electrodes and the sides of the rectangular substrate, when such a substrate is positioned on the substrate mounting surface, it is respectfully submitted that the amended claims clearly emphasize the distinctions over the cited prior art.

With regard to this, it is first noted that the primary reference to Machida fails to teach or suggest a rectangular substrate at all. Quite to the contrary, the primary reference to Machida deals with moving round substrates. Taking independent claim 31 as an example, this claim clearly defines:

- "1) that the electrostatic chuck includes a rectangular substrate mounting surface 'for receiving a rectangular substrate';
- 2) the configuration of the substrate mounting surface and the rod-like electrodes such that, when a rectangular substrate is mounted on the substrate mounting surface, the rod-like electrodes will be disposed along an edge portion of the rectangular substrate 'so that one of the shorter sides of each of said rod-like electrodes extends in parallel to a longer side of said rectangular substrate.'

Inasmuch as Machida is only directed to moving round substrates, it is, of course, completely devoid of any such claimed relationship between the sides of the rod-like electrodes and the sides of a rectangular substrate when such a rectangular substrate is mounted on the substrate mounting surface. Further, nothing in the cited secondary references makes up for this shortcoming in the primary reference regarding the above-noted amended claim features. Therefore, reconsideration and allowance of these amended claims is respectfully requested.

In the Office Action, the position appears to be taken from the claim objections that since positioning of electrodes relative to a rectangular substrate is temporary, the claim is effectively rendered confusing. As such, it appears that the end result is that the claims have been interpreted in the Office Action, with regard to the prior art,

without giving any weight to the claimed relationship between the sides of the rod-like electrodes and the sides of the rectangular substrate. Reconsideration of this interpretation is respectfully requested, particularly in light of the claim amendments. As noted above, the claims have now been amended to adopt the Examiner's proposed structural limitations, together with clarification of the structural elements of the claim structure with a rectangular substrate when such a rectangular substrate is mounted on the mounting surface. To extend the fuel-injector analogy set forth in the Request for Reconsideration filed on May 26, 2009, it is respectfully submitted that the claimed relationship between the sides of the rod-like electrodes and the sides of the rectangular substrate is similar to a relationship which could exist in a claim directed to a fuel injection with regard to the fuel itself. For example, the particular configuration of passages in the fuel injector to the fuel flowing therethrough to provide improved fuel injection should properly be given weight in a claim. It is respectfully submitted that the same holds true in the present instance since the claimed structure is particularly adapted for use with a rectangular substrate. Therefore, reconsideration and allowance of the amended claims is earnestly solicited.

Further consideration is respectfully requested with regard to claims, such as claims 35, 38-41, etc. which deal with particular cross-sectional shapes of the rod-like electrodes. Figs. 3(a) – 3(e) provide examples of the claimed cross-sectional shapes. On page 15 of the Office Action, it is argued that Fig. 15(a) - Fig. 15(e) of Machida, showing a top view of the electrodes, qualifies as reading on the claimed cross-sectional shape because:

“according to *Merriam-Webster's Collegiate Dictionary*, a cross-section is defined as a cutting or a piece of something cut off at a right angle to an axis.”

Applicants respectfully traverse this interpretation for the following reasons.

Referring to Fig. 15(a) – 15(e) of Machida, it is quite clear that what is being shown are top views. There is absolutely nothing in the Machida disclosure which suggests that these are sectional views taken by cutting the electrodes off at a right angle. Fig. 15(b) particularly clarifies this by showing the course or direction of wafer transportation relative to the electrodes. In Fig. 15(b) the wafers are shown as being round, thereby clearly emphasizing that one is looking down on the wafers being transported over the electrodes. If the wafers, and hence the electrodes, were being shown as a cross-sectional view, the wafers would appear to be rectangular in the cross-sectional view. Instead, the wafers are shown as being round, with dashed lines being shown within the body of the wafer to indicate that the wafers are located over the electrodes. Therefore, clearly Figs. 15(a) – 15(e) are not cut off views of anything, as required by the dictionary definition as set forth in the Office Action, but are, instead, top views that one would actually see if one were looking down upon the wafers mounted on the electrodes. Therefore, it is urged that the claimed cross-sectional shapes in claims such as claims 35 and 37-41 clearly distinguish over the cited prior art, and reconsideration and allowance of these claims as well is respectfully requested.

If the Examiner believes that there are any other points which may be clarified or otherwise disposed of either by telephone discussion or by personal interview, the Examiner is invited to contact Applicants' undersigned attorney at the number indicated below.

To the extent necessary, Applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to the Antonelli, Terry, Stout & Kraus,

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LLP Deposit Account No. 01-2135 (Docket No. 1113.45730X00), and please credit any excess fees to such deposit account.

Respectfully submitted,
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